

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 95-85
Table of Allotments) RM-8518
FM Broadcast Stations)
(Copeland, Kansas))

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COMMENTS AND COUNTERPROPOSAL

Dana J. Puopolo ("Puopolo") respectfully submits his comments and a counterproposal in the above captioned proceeding.

1. Puopolo proposes that the Commission assign FM Channel 280C1 to Ingalls, Kansas as its second local FM service, and assign FM Channel *224C1 to Copeland, Kansas as its third FM service. This would require amending Section 73.202(b) of the Commission's rules as follows:

| <u>Community:</u> | <u>Present:</u> | <u>Proposed:</u> |
|--------------------------|------------------------|-------------------------|
| Copeland, Kansas | 251C1, 256C1 | *224C1, 251C1, 256C1 |
| Ingalls, Kansas | 290A | 280C1, 290A |

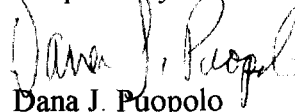
2. As the attached spacing studies show, FM channel *224C1 and 280C1 can both be assigned to their proposed respective communities in full compliance with the Commission's rules. The coordinates used in the studies are those listed in the National Atlas for Copeland and Ingalls, KS.

3. If FM channel 280C1, or another equivalent channel is allotted to Ingalls, KS, Puopolo intends to file an application for a construction permit to occupy said FM channel. Puopolo has no interest in the proposed noncommercial assignment to Copeland, KS.

4. Puopolo believes that the public interest, convenience, and necessity would be served by the Commission acting favorably on this counterproposal, and he urges the Commission to do so.

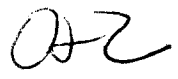
5. Puopolo hereby states and affirms that the statements in this comments and counterproposal are his, and that they are accurate to the best of his knowledge.

Respectfully submitted,


Dana J. Puopolo

37 Martin St.
Rehoboth, MA 02769
August 9, 1995

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FM SPACING STUDY FOR CHANNEL *224C1 AT COPELAND, KANSAS

Reference coordinates used are those listed in MM Docket No. 95-85 for Copeland, KS
They are N. Latitude 37-32-31 and W Longitude 100-37-45

All pertinent stations and allocations within 270 kilometers are listed. 270 kilometers represents the minimum distance requirement for class C to C1 co-channel, thus it is the maximum distance to be concerned with. All distances shown are in kilometers.

| <u>STATION</u> | <u>LOCATION</u> | <u>CHANNEL</u> | <u>ACTUAL DIST.</u> | <u>REQUIRED DIST.</u> |
|-----------------------|------------------------|-----------------------|----------------------------|------------------------------|
| KMZE | WOODWARD, OK | 221C3 | 177 | 76 |
| KBLJ | LA JUNTA, CO. | 221A | 264 | 75 |
| KBLJ(ord.) | LA JUNTA, CO | 221C3 | 264 | 76 |
| KQMA | PHILLIPSBURG,KS | 223C1 | 258 | 177 |
| ALLOC. | SHAMROCK, TX | 224A | 261 | 200 |
| KGLS | PRATT, KS | 226C | 208 | 105 |
| KSEC | LAMAR, CO | 227C1 | 182 | 105 |
| KJLS | HAYS, KS | 277C1 | 190 | 34 |

ANALYSIS:

FM Channel *224C1 can be assigned to Copeland, KS in full compliance with the Commission's Minimum Distance Separation requirements

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FM SPACING STUDY FOR CHANNEL 280C1 AT INGALLS, KS

Reference coordinates used are those listed in the National Atlas for Ingalls, KS

They are N. Latitude 37-49-48 and W Longitude 100-27-06

All pertinent stations and allocations within 270 kilometers are listed. 270 kilometers represents the minimum distance requirement for class C to C1 co-channel, thus it is the maximum distance to be concerned with. All distances shown are in kilometers.

| <u>STATION</u> | <u>LOCATION</u> | <u>CHANNEL</u> | <u>ACTUAL DIST.</u> | <u>REQUIRED DIST.</u> |
|-----------------------|------------------------|-----------------------|----------------------------|------------------------------|
| KJLS | HAYS, KS | 277C1 | 155 | 82 |
| KEYN-FM | WICHITA, KS | 279C1 | 258 | 177 |
| KNAB-FM | BURLINGTON, CO | 281C1 | 226 | 177 |
| KVGB-FM | GREAT BEND, KS | 282C1 | 162 | 82 |

ANALYSIS:

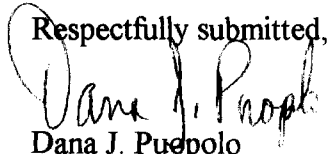
FM Channel 280C1 can be assigned to Ingalls, KS in full compliance with the Commission's Minimum Distance Separation requirements.

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Rehoboth, Massachusetts, 02769-2103
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CERTIFICATE OF SERVICE

I hereby certify that I have mailed via U.S. Express Mail, return receipt requested, a true copy of the Comments and Counterproposal attached to this notice to:
Mr. Stephen C. Simpson, Attorney for Great Plains Christian Radio at the address Below:

Stephen C. Simpson
1090 Vermont Avenue, N.W.
Suite 800
Washington D. C. 20005

Respectfully submitted,

Dana J. Puopolo
August 9, 1995